IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: Rochelle Abney-Raven : Chapter 13

Debtor : Bankruptcy No: 25-12322

DEBTOR'S MOTION TO EXTEND TIME TO FILE SCHEDULES, STATEMENTS, DISCLOSURES AND SUMMARIES

AND NOW, comes the Debtor, Rochelle Abney-Raven, by and through her attorney, Jeanne Marie Cella, Esq, and files this Motion to Extend Time to File Schedules, Statement of Financial Affairs, Disclosure of Atty. Compensation, Statement of Current Monthly Income and Summaries of Schedules and Certain Liabilities and avers as follows:

- 1. Debtor filed a voluntary Chapter 13 bankruptcy petition on June 10, 2025.
- 2. Debtor did not file his schedules, Statement of Financial Affairs,
 Statement of Current Monthly Income, Disclosure of Attorney Compensation or the
 Summaries of Schedules and Certain Liabilities.
- 3. The Debtor has experienced a delay in gathering some of the information required to complete said schedules and requires an additional fifteen (15) days in which to compile the documentation and confer with counsel so as to complete the schedules.
- 4. Due to the aforementioned, Debtor requests that an extension of fifteen (15) days be granted to file the aforementioned required documents.

WHEREFORE, Jeanne Marie Cella, Esquire, respectfully requests this Honorable Court grant him fourteen (14) days additional time in which to file the additional documents.

Respectfully submitted,

BY: /s/ Jeanne Marie Cella, Esquire

Jeanne Marie Cella, Esquire Counsel for Debtor 221 N. Olive Street Media, PA 19063 (610) 566-8500

Dated: June 24, 2025